

UNITED STATES DISTRICT COURT FOR THE NORTHERN
DISTRICT OF GEORGIA ATLANTA DIVISION

-----X
Joshua Winer,

Plaintiff,

v.

Case No. 1:25-CV-
02329

Umaymah Mohammad, AJP Educational Foundation, Inc.
A/K/A American Muslims for Palestine, WESPAC Foundation, Inc.,
Sean Eren as the representative of National Students for Justice in
Palestine, Doctors Against Genocide Society, CAIR-Nga Inc.
A/K/A CAIR-Georgia, CAIR Foundation Inc.,
A/K/A Council on Islamic Relations or CAIR, Rupa Marya,
Ibrahim Jouja as representative of Emory Students for Justice
in Palestine.

Defendants.
-----X

DECLARATON IN SUPPORT OF IBRAHIM JOUJA'S MOTION TO DISMISS

I, Jonathan Wallace, do hereby declare as follows:

1. I am an attorney admitted to practice in the Southern District of New York, and pro hac vice in this matter. I am counsel to defendant Ibrahim Jouja, and submit this declaration in support of the Defendant's motion to dismiss.
2. Mr. Jouja joins in the arguments asserted by co-defendant Umaymah Mohammad in her motion to dismiss filed contemporaneously, including without limitation: Plaintiff fails to state a cause of action under Section 1985(3), and therefore there is no federal question; The complaint is an improper shotgun pleading; all of of Defendants' utterances were First Amendment protected "pure speech"; all of Defendants' utterances were expressions of opinion and could not be defamatory; and that Dr. Winer is a public

figure, but failed to assert actual malice.

3. For these reasons, Mr. Jouja respectfully requests this Court to dismiss the First Amended Complaint.

4. Having reviewed this declaration, I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: Amagansett, NY
August 25, 2025

/s/ Jonathan Wallace
Jonathan Wallace
PO #728
Amagansett NY 11930
917-359-6234
jonathan.wallace80@gmail.com
Counsel for Defendant
Ibrahim Jouja
Admitted Pro Hac Vice